

EXHIBIT 2

AMY BARTOLETTI

June 14, 2012

<p>153</p> <p>1 A. BARTOLETTI</p> <p>2 A. Um-hum.</p> <p>3 Q. To Mr. Bynam?</p> <p>4 MR. WIGDOR: Yes.</p> <p>5 A. Yes.</p> <p>6 Q. You say: "Honestly, things suck</p> <p>7 right now. We are swamped, bonuses were bad</p> <p>8 and little motivation." Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Were bonuses bad for 2007?</p> <p>11 A. This brings back memories and my</p> <p>12 bonus was less than the year before.</p> <p>13 Q. Do you know how much less?</p> <p>14 A. I don't remember the number, but I</p> <p>15 remember I was down.</p> <p>16 Q. Do you know how bonuses were</p> <p>17 across the entire bank for 2007?</p> <p>18 A. I don't know.</p> <p>19 Q. Do you know whether they were down</p> <p>20 as compared to --</p> <p>21 A. Across the entire bank, I have no</p> <p>22 idea.</p> <p>23 Q. How about within your group, do</p> <p>24 you know whether the bonuses in 2007 were down</p> <p>25 as compared to the prior year?</p>	<p>155</p> <p>1 A. BARTOLETTI</p> <p>2 Q. Does this e-mail where you say</p> <p>3 "Things suck right now, we are swamped,</p> <p>4 bonuses were bad and little motivation," does</p> <p>5 that refresh your recollection as to whether</p> <p>6 you were thinking of leaving?</p> <p>7 A. No. I mean, you know, I think</p> <p>8 this is right after we had to let Corey go,</p> <p>9 which, if you looked at all public finance,</p> <p>10 the general mood throughout the department was</p> <p>11 pretty negative at that time.</p> <p>12 Q. Why is that?</p> <p>13 A. Because there were layoffs so</p> <p>14 people were upset.</p> <p>15 Q. And you had a similar mood?</p> <p>16 A. I had that mood at times. I'm</p> <p>17 sure there are other times when I was working</p> <p>18 so hard I couldn't even think about it.</p> <p>19 Q. Who is John Heppollette?</p> <p>20 A. John Heppollette. He is a an</p> <p>21 employee within municipal securities. He's</p> <p>22 also a friend of mine.</p> <p>23 Q. And what is his position within</p> <p>24 municipal securities?</p> <p>25 A. I don't know his exact position.</p>
<p>154</p> <p>1 A. BARTOLETTI</p> <p>2 A. I don't know. I could assume they</p> <p>3 were down since mine was down.</p> <p>4 Q. And why would you assume that?</p> <p>5 A. I don't -- I don't know. I'm sure</p> <p>6 I'm making that assumption because my bonus</p> <p>7 was down and I think I was one of the top</p> <p>8 employees in the top performers in our group.</p> <p>9 So if my bonus was down, I would assume that</p> <p>10 the rest of the bonuses in our group were</p> <p>11 down.</p> <p>12 Q. Did you communicate bonuses to</p> <p>13 anyone else in your group for 2007?</p> <p>14 A. I communicated bonuses to analysts</p> <p>15 and associates. I don't know if it was 2007.</p> <p>16 I believe I did. But that would have been,</p> <p>17 generally analyst's bonuses are in July so</p> <p>18 it's different timing.</p> <p>19 Q. So you think you communicated</p> <p>20 bonuses to them in July of 2007?</p> <p>21 A. I think so.</p> <p>22 Q. After you received a lower bonus</p> <p>23 for '07 than you had in '06, did you think</p> <p>24 about leaving?</p> <p>25 A. I don't remember.</p>	<p>156</p> <p>1 A. BARTOLETTI</p> <p>2 I know he reports to, what's his name, Joe</p> <p>3 Geraci.</p> <p>4 Q. Is Mr. Heppollette a managing</p> <p>5 director?</p> <p>6 A. Yes.</p> <p>7 Q. Was he a managing director in</p> <p>8 2008?</p> <p>9 A. Yes, I believe so.</p> <p>10 Q. And you say he was a friend of</p> <p>11 yours?</p> <p>12 A. Um-hum.</p> <p>13 Q. For how long had Mr. Heppollette</p> <p>14 been a friend of yours?</p> <p>15 A. I've known John a long time.</p> <p>16 Probably since 1994.</p> <p>17 Q. Let me show you an e-mail that is</p> <p>18 dated -- well, it is May 14th and May 15th,</p> <p>19 between you and Mr. Heppollette.</p> <p>20 A. Okay.</p> <p>21 MR. TURNBULL: I will have this</p> <p>22 marked as Bartoletti Exhibit 7.</p> <p>23 (Bartoletti Exhibit 7, e-mail</p> <p>24 dated May 14th and May 15th,</p> <p>25 between Amy Bartoletti and Mr.</p>



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AMY BARTOLETTI

June 14, 2012

<p>157</p> <p>1 A. BARTOLETTI</p> <p>2 Heppolette marked for</p> <p>3 identification, as of this date.)</p> <p>4 Q. Do you recall these e-mails, Mrs.</p> <p>5 Bartoletti?</p> <p>6 A. I don't recall the exact e-mails,</p> <p>7 but I recall the general conversation.</p> <p>8 Q. And do you have any reason to</p> <p>9 believe you didn't send or receive these?</p> <p>10 A. No.</p> <p>11 Q. If you would turn to the third</p> <p>12 page.</p> <p>13 A. Um-hum.</p> <p>14 Q. Again, this is an e-mail chain</p> <p>15 that starts at the back and works its way up.</p> <p>16 A. Yes.</p> <p>17 Q. The first e-mail of the chain from</p> <p>18 you to Mr. Heppolette you say: "Need your</p> <p>19 opinion. Should I look for another job? I</p> <p>20 have one pretty definite option if needed."</p> <p>21 First of all, why were you asking</p> <p>22 Mr. Heppolette if you should look for another</p> <p>23 job?</p> <p>24 A. I was very concerned about them</p> <p>25 cutting the entire housing group.</p>	<p>159</p> <p>1 A. BARTOLETTI</p> <p>2 That's pretty mind-boggling.</p> <p>3 Q. Had you applied to any other</p> <p>4 employers as of May 2008 --</p> <p>5 A. I don't think so.</p> <p>6 Q. -- or before then?</p> <p>7 A. I don't think so. Unless someone</p> <p>8 had approached me, but I don't remember any</p> <p>9 firm approaching me specifically at that time.</p> <p>10 Q. Do you have any reason to believe</p> <p>11 that you were being dishonest to Mr.</p> <p>12 Heppolette when you said I have one pretty</p> <p>13 definite option if needed?</p> <p>14 A. I mean, he is a friend of mine. I</p> <p>15 don't think so, but.</p> <p>16 Q. You can't remember what you are</p> <p>17 referring to, though?</p> <p>18 A. No, I really don't. I mean, I</p> <p>19 don't have any e-mails that I can -- that I</p> <p>20 found that would support this. Unless there</p> <p>21 was some sort of residual from when Morgan</p> <p>22 Stanley had approached me the year prior.</p> <p>23 It's possible.</p> <p>24 Q. Do you recall speaking to Morgan</p> <p>25 Stanley in 2008?</p>
<p>158</p> <p>1 A. BARTOLETTI</p> <p>2 Q. Even in May 2008?</p> <p>3 A. It was before the June layoffs.</p> <p>4 Q. So even then you thought they,</p> <p>5 that Citigroup might get out of the housing</p> <p>6 business altogether?</p> <p>7 A. I was worried which I think is</p> <p>8 rational and legitimate.</p> <p>9 Q. And why were you asking that</p> <p>10 question of Mr. Heppolette?</p> <p>11 A. Because John is fairly high up</p> <p>12 within municipal securities, so he sometimes</p> <p>13 hears what's going on.</p> <p>14 Q. So you thought he might have some</p> <p>15 information?</p> <p>16 A. Um-hum, yes.</p> <p>17 Q. And then you say I have one pretty</p> <p>18 definite option if needed?</p> <p>19 A. I have no idea what that is. I</p> <p>20 wish I could tell you, but I really don't</p> <p>21 know.</p> <p>22 Q. Do you recall whether you had</p> <p>23 received any offers of employment in or around</p> <p>24 May of 2008?</p> <p>25 A. No, I don't remember that at all.</p>	<p>160</p> <p>1 A. BARTOLETTI</p> <p>2 A. No, I don't.</p> <p>3 Q. Do you recall speaking to any</p> <p>4 other employers in 2008?</p> <p>5 A. I don't recall. Well, in 2008,</p> <p>6 yes, I mean, I spoke to many employers in</p> <p>7 2008, sorry.</p> <p>8 Q. How about before May 14th of 2008?</p> <p>9 A. No, I don't remember speaking to</p> <p>10 any before May 14th.</p> <p>11 Q. If you were conducting a job</p> <p>12 search or had e-mailed with any prospective</p> <p>13 employer, would you still have those e-mails?</p> <p>14 A. Yes.</p> <p>15 Q. Going back to May of 2008?</p> <p>16 A. Oh, yes, absolutely.</p> <p>17 Q. And did you look for any such</p> <p>18 e-mails?</p> <p>19 A. I did, yeah, I looked for every</p> <p>20 type of e-mail that would be remotely close to</p> <p>21 this.</p> <p>22 Q. And you don't recall finding any?</p> <p>23 A. I don't.</p> <p>24 Q. And if you would turn to the prior</p> <p>25 page, you can see at the bottom Mr.</p>



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AMY BARTOLETTI

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<p style="text-align: right;">161</p> <p>1 A. BARTOLETTI</p> <p>2 Heppolette's response to you?</p> <p>3 A. Yes.</p> <p>4 Q. Where he says "we're all at risk."</p> <p>5 A. Um-hum.</p> <p>6 Q. "Let's talk about it."</p> <p>7 A. Yup.</p> <p>8 Q. Did you have a discussion with Mr.</p> <p>9 Heppolette about this around May 14th of 2008?</p> <p>10 A. I think we had a very brief</p> <p>11 discussion.</p> <p>12 Q. And what was that discussion?</p> <p>13 A. I think I asked him if he knew if</p> <p>14 the housing group was getting cut, and I think</p> <p>15 he said he didn't know. And that was really</p> <p>16 the extent of it, because, I mean, although he</p> <p>17 may hear things at certain times, he wasn't as</p> <p>18 involved in the public finance decision-making</p> <p>19 process.</p> <p>20 Q. In May of 2008 there had already</p> <p>21 been two rounds of reductions, correct?</p> <p>22 A. Yes.</p> <p>23 Q. And in May of 2008 you expected</p> <p>24 there to be more rounds --</p> <p>25 A. Yes.</p>	<p style="text-align: right;">163</p> <p>1 A. BARTOLETTI</p> <p>2 A. Yes.</p> <p>3 Q. And this was the same day you were</p> <p>4 offered the position to be head of the housing</p> <p>5 group?</p> <p>6 A. I believe it was, as sole head.</p> <p>7 Q. And so you thought Mr. Brownstein</p> <p>8 was using Mr. Heppolette to try to convince</p> <p>9 you to accept the position?</p> <p>10 A. I don't know what he was trying to</p> <p>11 do.</p> <p>12 Q. But somehow you thought Mr.</p> <p>13 Brownstein going to Mr. Heppolette was bad?</p> <p>14 A. It was just weird. It was weird.</p> <p>15 Q. And --</p> <p>16 A. Because I didn't report to John in</p> <p>17 any fashion, so it was a weird sort of thing.</p> <p>18 Q. So what did you and Mr. Heppolette</p> <p>19 discuss that day?</p> <p>20 A. We didn't discuss a lot.</p> <p>21 Q. Do you recall anything about that</p> <p>22 conversation?</p> <p>23 A. I don't recall a whole lot. I</p> <p>24 think he also thought it was a little strange</p> <p>25 that Brownstein had asked him to talk to me.</p>
<p style="text-align: right;">162</p> <p>1 A. BARTOLETTI</p> <p>2 Q. -- correct?</p> <p>3 Why did you expect that?</p> <p>4 A. Everyone expected it. I don't</p> <p>5 know if it was directly communicated to us or</p> <p>6 not, but it was, I think a pretty widely held</p> <p>7 belief in public finance that there were going</p> <p>8 to be more reductions.</p> <p>9 Q. Even as of May 2008?</p> <p>10 A. I think so.</p> <p>11 Q. Did you talk to Mr. Heppolette</p> <p>12 about the opportunity to be head of the</p> <p>13 housing group?</p> <p>14 A. Yes.</p> <p>15 Q. And when was that?</p> <p>16 A. I think it was, I could be wrong</p> <p>17 about the date and time, but I think it was</p> <p>18 the same day that Mr. Brownstein talked to me.</p> <p>19 I think he went and got John and asked John to</p> <p>20 come talk to me which was pretty bad.</p> <p>21 Q. Which was pretty bad you said?</p> <p>22 A. Well, it's just, I felt like David</p> <p>23 was using my friendship with John to try to</p> <p>24 influence me, which, I mean it's fine, but.</p> <p>25 Q. So did Mr. Heppolette talk to you?</p>	<p style="text-align: right;">164</p> <p>1 A. BARTOLETTI</p> <p>2 Q. Do you recall anything else about</p> <p>3 that conversation?</p> <p>4 A. No.</p> <p>5 Q. Did you and Mr. Heppolette talk</p> <p>6 about whether you should accept the position?</p> <p>7 A. I don't remember. Probably.</p> <p>8 Q. Did you take notes --</p> <p>9 A. No.</p> <p>10 Q. -- of that?</p> <p>11 A. No.</p> <p>12 Q. After the layoff of Mr. Fluehr,</p> <p>13 did you continue to have concerns that there</p> <p>14 might be additional layoffs?</p> <p>15 A. Yes.</p> <p>16 Q. And did you communicate those</p> <p>17 concerns to others?</p> <p>18 A. I'm sure I did at various points</p> <p>19 in time.</p> <p>20 Q. Who is Ward Marsh?</p> <p>21 A. The head of municipal securities.</p> <p>22 Q. Did you raise your concerns to Mr.</p> <p>23 Marsh at any point?</p> <p>24 A. I don't know if I raised those</p> <p>25 concerns to him. I don't think so, but.</p>



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<p>165</p> <p>1 A. BARTOLETTI</p> <p>2 Q. Before you were informed that you</p> <p>3 were going to be part of the November</p> <p>4 reduction in force, were you concerned in</p> <p>5 November that you might be let go?</p> <p>6 A. Again, I was very concerned that</p> <p>7 they would let the entire housing group go.</p> <p>8 Q. And you were aware before you were</p> <p>9 told that there were going to be additional</p> <p>10 layoffs?</p> <p>11 A. Yes.</p> <p>12 Q. When you were informed of your</p> <p>13 termination, I think you said earlier you were</p> <p>14 surprised or shocked, is that right?</p> <p>15 A. Yes.</p> <p>16 Q. You knew in that week in which you</p> <p>17 were told, that it was a possibility you would</p> <p>18 be laid off, right?</p> <p>19 A. I knew it was a possibility, but,</p> <p>20 again, I thought the possibility was that the</p> <p>21 entire housing group would be let go and I</p> <p>22 know in no circumstance in my realm of</p> <p>23 possibilities did I think that I would be let</p> <p>24 go and Mike would be retained. That never,</p> <p>25 ever, ever crossed my mind.</p>	<p>167</p> <p>1 A. BARTOLETTI</p> <p>2 A. Can you repeat the question.</p> <p>3 Q. If Citi had decided to let the</p> <p>4 whole housing group go, you wouldn't have</p> <p>5 thought that was discriminatory, correct?</p> <p>6 A. Correct, because Citi would not</p> <p>7 have had to make a choice between a man and a</p> <p>8 woman and who to hire and who to let go.</p> <p>9 Q. If Citi had decided to let Mr.</p> <p>10 Koessel go, as well as, you as part of that</p> <p>11 reduction, would you think your termination</p> <p>12 was discriminatory?</p> <p>13 MR. WIGDOR: Objection.</p> <p>14 A. You're asking me a subjective</p> <p>15 question now.</p> <p>16 Q. I'm just asking for your belief.</p> <p>17 MR. WIGDOR: Objection.</p> <p>18 A. Can you repeat the question again.</p> <p>19 Q. If Citi had decided to let Mr.</p> <p>20 Koessel go as well as you, would you have felt</p> <p>21 the decision to let you go was discriminatory?</p> <p>22 MR. WIGDOR: Objection.</p> <p>23 A. The other circumstances of</p> <p>24 discrimination still stand when you look at</p> <p>25 total percentages of women let go, but if that</p>
<p>166</p> <p>1 A. BARTOLETTI</p> <p>2 Q. If they had, if Citigroup had</p> <p>3 decided to get out of the housing, the public</p> <p>4 finance housing business altogether and you</p> <p>5 were let go as part of that decision, I take</p> <p>6 it you wouldn't think that was discriminatory?</p> <p>7 MR. WIGDOR: Objection.</p> <p>8 Q. Correct?</p> <p>9 MR. WIGDOR: You can answer.</p> <p>10 A. If Citi had let the entire housing</p> <p>11 group go, Citi would not have had to make a</p> <p>12 decision between a man or a woman and decide</p> <p>13 who to keep and who to fire. But the decision</p> <p>14 that Citigroup made in letting three women go</p> <p>15 and retaining less qualified men, is where my</p> <p>16 basis of discrimination comes from.</p> <p>17 Q. So if Citi had decided to let the</p> <p>18 whole group go, you wouldn't have thought that</p> <p>19 was discriminatory, correct?</p> <p>20 MR. WIGDOR: Objection. You can</p> <p>21 answer. You can answer it if you can.</p> <p>22 A. I thought I just answered that.</p> <p>23 Q. I know it was the same question.</p> <p>24 I didn't think you had answered it.</p> <p>25 MR. WIGDOR: Objection.</p>	<p>168</p> <p>1 A. BARTOLETTI</p> <p>2 choice was not made to let me go and retain a</p> <p>3 lesser qualified male, then that's a different</p> <p>4 decision.</p> <p>5 Q. And if that had been made, you</p> <p>6 wouldn't have felt the decision to let you go</p> <p>7 was discriminatory, correct?</p> <p>8 MR. WIGDOR: Objection.</p> <p>9 You can answer, if you can.</p> <p>10 A. Again, the other basis of</p> <p>11 discrimination still stands.</p> <p>12 Q. The statistical basis?</p> <p>13 A. Yes.</p> <p>14 Q. You've said that you were the</p> <p>15 better qualified of the two between you and</p> <p>16 Mr. Koessel.</p> <p>17 A. Yes.</p> <p>18 Q. And I take it that is at least</p> <p>19 your opinion, correct?</p> <p>20 MR. WIGDOR: Objection.</p> <p>21 A. That is my opinion.</p> <p>22 Q. Do you know what Mr. Brownstein's</p> <p>23 opinion was as to the relative abilities and</p> <p>24 merits of you and Mr. Koessel?</p> <p>25 A. Well, I know who Mr. Brownstein</p>



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<p>177</p> <p>1 A. BARTOLETTI</p> <p>2 Q. Did you ever go to Citigroup and</p> <p>3 tell them you had an offer to go to another</p> <p>4 firm?</p> <p>5 A. Yes.</p> <p>6 Q. When was that?</p> <p>7 A. I believe it was 2006, maybe.</p> <p>8 Q. And tell me about that. What were</p> <p>9 the circumstances.</p> <p>10 A. I was given an offer from I think</p> <p>11 it was Morgan Stanley at the time to go work</p> <p>12 in their housing group.</p> <p>13 Q. So I take it you had interviewed</p> <p>14 with Morgan Stanley?</p> <p>15 A. Yes.</p> <p>16 Q. And that was in 2006?</p> <p>17 A. I think it was 2006. I don't</p> <p>18 remember the exact year. Maybe it was before</p> <p>19 then. I'm not really a hundred percent sure.</p> <p>20 Q. And do you recall what the offer</p> <p>21 was from Morgan Stanley?</p> <p>22 A. No.</p> <p>23 Q. Was it an offer in writing?</p> <p>24 A. I believe it was an offer in</p> <p>25 writing.</p>	<p>179</p> <p>1 A. BARTOLETTI</p> <p>2 as a team?</p> <p>3 A. Yes.</p> <p>4 Q. And prior to 2006 had you and Mr.</p> <p>5 Fluehr sought other opportunities as a team?</p> <p>6 A. I don't remember. I don't think</p> <p>7 so.</p> <p>8 Q. So you said Mr. Fluehr informed</p> <p>9 Citigroup that you and he had offers. Is that</p> <p>10 right?</p> <p>11 A. Yes.</p> <p>12 Q. Do you know who he informed?</p> <p>13 A. I don't.</p> <p>14 Q. And what happened as a result of</p> <p>15 Citigroup being informed that you had an</p> <p>16 offer?</p> <p>17 A. Citigroup countered -- they</p> <p>18 counteroffered.</p> <p>19 Q. Meaning what?</p> <p>20 A. Meaning they offered the same or</p> <p>21 higher level of pay that Morgan Stanley was</p> <p>22 offering because they wanted to retain us.</p> <p>23 Q. And do you recall who was involved</p> <p>24 in that decision?</p> <p>25 A. I don't -- I don't remember. I</p>
<p>178</p> <p>1 A. BARTOLETTI</p> <p>2 Q. Do you have a copy of that still?</p> <p>3 A. Oh, boy, I don't -- I don't know.</p> <p>4 I could search. I thought I had turned over</p> <p>5 all of my e-mails and anything that had to do</p> <p>6 with any employment offers, over. Anything</p> <p>7 that I had, I did turn over, so.</p> <p>8 ^ MR. TURNBULL: If you have</p> <p>9 that, we call for the production of</p> <p>10 that.</p> <p>11 Q. So after receiving the offer from</p> <p>12 Morgan Stanley, did you come back and tell</p> <p>13 Citigroup?</p> <p>14 A. I personally did not, actually.</p> <p>15 Q. Who --</p> <p>16 A. Mr. Fluehr, he was also given an</p> <p>17 offer and I believe he was the one who</p> <p>18 approached Mr. Chin.</p> <p>19 Q. So how did it come about that both</p> <p>20 you and Mr. Fluehr received offers at the same</p> <p>21 time?</p> <p>22 A. I think Morgan Stanley had</p> <p>23 contacted both of us.</p> <p>24 Q. So was the thought or were you and</p> <p>25 Mr. Fluehr thinking of going to Morgan Stanley</p>	<p>180</p> <p>1 A. BARTOLETTI</p> <p>2 think it was probably Frank Chin, but I'm not</p> <p>3 a hundred percent sure.</p> <p>4 Q. And so as a result of that, did</p> <p>5 you get a guarantee for compensation?</p> <p>6 A. I did not have anything in writing</p> <p>7 from what I recall, but I think I was given a</p> <p>8 verbal guarantee or assurance that I would get</p> <p>9 paid a certain amount.</p> <p>10 Q. That verbal assurance, was that</p> <p>11 from Mr. Chin?</p> <p>12 A. I believe it was.</p> <p>13 Q. And what was the amount?</p> <p>14 A. I don't remember.</p> <p>15 Q. Did you get the amount that you</p> <p>16 were verbally promised?</p> <p>17 A. I believe so.</p> <p>18 Q. Was it --</p> <p>19 A. I don't remember being unhappy,</p> <p>20 so.</p> <p>21 Q. Was it just a one-year?</p> <p>22 A. I think it was just a one-year</p> <p>23 from what I recall.</p> <p>24 MR. TURNBULL: This is probably a</p> <p>25 good time for a lunch break.</p>



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<p>189</p> <p>1 A. BARTOLETTI</p> <p>2 Q. And you don't recall what year she</p> <p>3 was a summer intern?</p> <p>4 A. I don't know what year that was.</p> <p>5 Q. Do you recall that after her</p> <p>6 summer internship she received an offer to</p> <p>7 join?</p> <p>8 A. Yes.</p> <p>9 Q. And do you recall you had an</p> <p>10 opinion as to whether she should get an offer?</p> <p>11 A. I was asked if she should be given</p> <p>12 an offer into the housing group, and I did not</p> <p>13 think that she should be given an offer in the</p> <p>14 housing group.</p> <p>15 Q. And why not?</p> <p>16 A. Difficult to say, I don't remember</p> <p>17 the exact circumstances. We have a lot of</p> <p>18 summer interns. If I had to formulate a guess</p> <p>19 as to why, it is housing is one of the most</p> <p>20 quantitative groups in public finance at</p> <p>21 Citigroup and perhaps her quantitative skills</p> <p>22 weren't appropriate for the housing group.</p> <p>23 Q. And do you recall in fact</p> <p>24 expressing that view?</p> <p>25 A. I must have expressed it to</p>	<p>191</p> <p>1 A. BARTOLETTI</p> <p>2 her summer internship?</p> <p>3 MR. WIGDOR: Objection.</p> <p>4 A. I don't recall.</p> <p>5 Q. You don't recall one way or the</p> <p>6 other?</p> <p>7 A. I mean, I don't even know what you</p> <p>8 mean, honestly.</p> <p>9 Q. Well, you have mentioned that you</p> <p>10 didn't think or that Ms. Sharpton might not</p> <p>11 have the quantitative skills for the housing</p> <p>12 group, correct?</p> <p>13 A. Yes.</p> <p>14 Q. Tell me what you mean by that.</p> <p>15 What sort of quantitative skills are required</p> <p>16 for the group?</p> <p>17 A. I mean, housing is one of -- is</p> <p>18 probably one, if not the most quantitative</p> <p>19 groups in public finance. There are a couple</p> <p>20 of others that are very quantitative as well.</p> <p>21 Q. And when you say quantitative, you</p> <p>22 mean you have to do a lot of mathematical</p> <p>23 calculations?</p> <p>24 A. It is mathematical. It's also the</p> <p>25 ability to do complex formulas in Excel and</p>
<p>190</p> <p>1 A. BARTOLETTI</p> <p>2 somebody. I don't remember to whom.</p> <p>3 Q. And do you recall whether others</p> <p>4 in the group had the same opinion as you about</p> <p>5 whether Ms. Sharpton should get an offer?</p> <p>6 A. I don't remember. I don't know.</p> <p>7 Q. Do you recall whether Ping shared</p> <p>8 the same opinion as you?</p> <p>9 A. I don't remember honestly.</p> <p>10 Q. Do you recall whether Mr. Koessel</p> <p>11 shared the same opinion as you?</p> <p>12 A. No, I don't remember.</p> <p>13 Q. Did you have an opinion that --</p> <p>14 did you express an opinion that you thought if</p> <p>15 she got an offer, it would be because of her</p> <p>16 dad and her uncle?</p> <p>17 A. Did I express that to people at</p> <p>18 the time? I don't think so.</p> <p>19 I mean, at the time I don't think</p> <p>20 I knew who her uncle was. I know now, but I</p> <p>21 don't think I knew at the time.</p> <p>22 Q. So you don't recall expressing it?</p> <p>23 A. I don't recall.</p> <p>24 Q. Do you recall whether Ms. Sharpton</p> <p>25 had developed any sort of reputation during</p>	<p>192</p> <p>1 A. BARTOLETTI</p> <p>2 learn DBC housing and understand very complex</p> <p>3 mathematical relationships.</p> <p>4 Q. And it was your opinion that Ms.</p> <p>5 Sharpton didn't have those skills?</p> <p>6 A. I don't remember that, like I</p> <p>7 said. I said if there was a reason, that</p> <p>8 probably would have been it. I don't remember</p> <p>9 specifically.</p> <p>10 We had interns every year. I</p> <p>11 don't remember specifically much about</p> <p>12 Brittany, so.</p> <p>13 Q. If somebody from Citigroup</p> <p>14 testified that you expressed that concern</p> <p>15 about Ms. Sharpton and your belief that she</p> <p>16 shouldn't be allowed to join the housing</p> <p>17 group, would you think that they were being</p> <p>18 dishonest?</p> <p>19 MR. WIGDOR: Objection.</p> <p>20 A. You are asking me a subjective</p> <p>21 question.</p> <p>22 Q. No, I don't think it is</p> <p>23 subjective. I'm just asking you a question.</p> <p>24 Do you want me to have it reread?</p> <p>25 MR. WIGDOR: Objection. You can</p>



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<p style="text-align: right;">197</p> <p>1 A. BARTOLETTI</p> <p>2 Q. And you said that it's because of</p> <p>3 the statistics?</p> <p>4 A. Yes.</p> <p>5 Q. And I'm asking is there any other</p> <p>6 basis for your belief that gender played a</p> <p>7 role in her termination?</p> <p>8 A. I can go back and try to think of</p> <p>9 the mediation and remember what was said, but</p> <p>10 I wasn't paying particular attention to the</p> <p>11 specifics of Ms. Sharpton's case.</p> <p>12 Q. So is --</p> <p>13 A. And I did not work with her.</p> <p>14 Q. So as we sit here today, you can't</p> <p>15 think of any other basis for your belief that</p> <p>16 gender played a role in her termination?</p> <p>17 MR. WIGDOR: Objection.</p> <p>18 A. Oh, no, that's incorrect,</p> <p>19 actually.</p> <p>20 Q. Okay, tell me what other basis.</p> <p>21 A. Because I believe that less</p> <p>22 qualified men in her group were retained, come</p> <p>23 to think of it.</p> <p>24 Q. So do you know how Ms. Sharpton's</p> <p>25 performance was in her group?</p>	<p style="text-align: right;">199</p> <p>1 A. BARTOLETTI</p> <p>2 to retain clients and how we were going to</p> <p>3 continue serving our clients the way we had</p> <p>4 prior.</p> <p>5 Q. Were those concerns because the</p> <p>6 group was shrinking?</p> <p>7 A. That was part of it, yes.</p> <p>8 Q. And what did you say to Ms. Siu to</p> <p>9 address those concerns?</p> <p>10 A. I don't remember exactly what I</p> <p>11 said to her, but I tried to give her every</p> <p>12 assurance that I could and I also asked Mr.</p> <p>13 Brownstein to speak to her.</p> <p>14 Q. And did Mr. Brownstein speak to</p> <p>15 her?</p> <p>16 A. He did.</p> <p>17 Q. Why did you ask Mr. Brownstein to</p> <p>18 speak to her?</p> <p>19 A. Because I couldn't personally</p> <p>20 comment on Citi's commitment to the housing</p> <p>21 group. That wasn't in my realm to do so</p> <p>22 because I had no control over that. So I</p> <p>23 thought it would make sense for David who does</p> <p>24 have some control over those factors, to speak</p> <p>25 to her.</p>
<p style="text-align: right;">198</p> <p>1 A. BARTOLETTI</p> <p>2 A. I don't know.</p> <p>3 Q. So how do you come to the</p> <p>4 conclusion that less qualified men were</p> <p>5 retained if you don't know?</p> <p>6 A. Because that allegation has been</p> <p>7 made.</p> <p>8 Q. Other than the allegation being</p> <p>9 made, do you have any other basis for that</p> <p>10 statement?</p> <p>11 A. Not having worked in her group, I</p> <p>12 can't say that.</p> <p>13 Q. Chia Siu, we talked about earlier,</p> <p>14 where she expressed some concerns about the</p> <p>15 group after the June 2008 RIF, correct?</p> <p>16 A. Yes.</p> <p>17 Q. And did you talk to her about her</p> <p>18 concerns?</p> <p>19 A. Yes.</p> <p>20 Q. And tell me what she said her</p> <p>21 concerns were in your discussion?</p> <p>22 A. From what I remember, this is</p> <p>23 quite a while ago, but from what I remember</p> <p>24 she was concerned about Citi's commitment to</p> <p>25 housing. She was concerned how we were going</p>	<p style="text-align: right;">200</p> <p>1 A. BARTOLETTI</p> <p>2 Q. And did you tell Mr. Brownstein</p> <p>3 that his discussion with Ping had been</p> <p>4 helpful?</p> <p>5 A. Sorry?</p> <p>6 Q. Let me just show you a document.</p> <p>7 It's an e-mail dated June 27, 2008. The top</p> <p>8 one is an e-mail from you to David Brownstein</p> <p>9 and others.</p> <p>10 A. Okay.</p> <p>11 MR. TURNBULL: We will mark this</p> <p>12 as Bartoletti Exhibit 10.</p> <p>13 (Bartoletti Exhibit 10, e-mail</p> <p>14 dated June 27, 2008 marked for</p> <p>15 identification, as of this date.)</p> <p>16 A. Okay.</p> <p>17 Q. Do you recall this e-mail?</p> <p>18 A. I have --</p> <p>19 Q. Or this chain of e-mails?</p> <p>20 A. -- vague recollection of this,</p> <p>21 yes.</p> <p>22 Q. And you see the bottom e-mail, the</p> <p>23 first e-mail in the chain is from Marty</p> <p>24 Feinstein to you and others?</p> <p>25 A. Yes.</p>



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<p>201</p> <p>1 A. BARTOLETTI</p> <p>2 Q. And it is about a discussion he</p> <p>3 had with Chia?</p> <p>4 A. Yes.</p> <p>5 Q. And then he lists the concerns</p> <p>6 that he said Chia raised with him. Do you see</p> <p>7 that?</p> <p>8 A. Um-hum.</p> <p>9 Q. Is that a yes?</p> <p>10 A. Yes, sorry.</p> <p>11 Q. In the list of concerns that Mr.</p> <p>12 Feinstein raised identifies, are those similar</p> <p>13 to the concerns that Ms. Siu had raised with</p> <p>14 you?</p> <p>15 A. Similar, but not exact.</p> <p>16 Q. Did you have the same concerns</p> <p>17 that Ms. Siu had about the group?</p> <p>18 A. I did not have the same concerns.</p> <p>19 I had concerns, but not the same concerns.</p> <p>20 Q. Did you have concerns about the</p> <p>21 group shrinking?</p> <p>22 A. I had concerns about the number of</p> <p>23 people because it just meant more work for all</p> <p>24 of us and there is so many hours in a day.</p> <p>25 Q. And then you see Mr. Brownstein,</p>	<p>203</p> <p>1 A. BARTOLETTI</p> <p>2 over some of these decisions.</p> <p>3 Q. And what's that belief based on?</p> <p>4 A. Based on some of the decisions</p> <p>5 that were made.</p> <p>6 Q. And --</p> <p>7 A. Again, I can tell you</p> <p>8 specifically, given the fact of who was</p> <p>9 retained and who was let go in our group. I</p> <p>10 think David had a very big hand in that and I</p> <p>11 think it has his fingerprints on it. I mean,</p> <p>12 I don't think it is something Mr. Chin would</p> <p>13 have made in a vacuum.</p> <p>14 Q. So your belief that Mr. Brownstein</p> <p>15 had more say in the decisions is based on who</p> <p>16 was kept and who was let go?</p> <p>17 A. That, as well as who communicated</p> <p>18 to me that I was going to be sole head of the</p> <p>19 group initially, and then Mr. Brownstein was</p> <p>20 also the person that subsequently communicated</p> <p>21 to me that I would be then co-head after</p> <p>22 speaking to Mr. Koessel. You know, David was</p> <p>23 taking a prominent role in these decisions and</p> <p>24 in communicating these decisions.</p> <p>25 Q. And then you continue: "We have</p>
<p>202</p> <p>1 A. BARTOLETTI</p> <p>2 in response to Mr. Feinstein's e-mail says,</p> <p>3 "Do you think I should also chat with her?"</p> <p>4 A. Yes.</p> <p>5 Q. And then up above you say to Mr.</p> <p>6 Brownstein: "I think that would be very</p> <p>7 helpful, David." And you gave one reason</p> <p>8 earlier why you thought it would be helpful.</p> <p>9 Any other reasons why you thought</p> <p>10 that would be helpful?</p> <p>11 A. The main reason, again, was that</p> <p>12 Mr. Brownstein was in control of a lot of the</p> <p>13 decisions that were being made, therefore, he</p> <p>14 was really one of the few people that could</p> <p>15 give her the assurances she was looking for</p> <p>16 that Citi was committed to housing.</p> <p>17 Q. And you say Mr. Brownstein was in</p> <p>18 control. Was that because he was a co-head of</p> <p>19 public finance?</p> <p>20 A. Yes. Yes.</p> <p>21 Q. And do you think Mr. Chin was also</p> <p>22 in control, to use your words?</p> <p>23 A. I believe that they both had some</p> <p>24 say. I personally, and it is a personal</p> <p>25 opinion, think David had a little more control</p>	<p>204</p> <p>1 A. BARTOLETTI</p> <p>2 all talked to her but I think it will be</p> <p>3 meaningful coming from you. It certainly</p> <p>4 helped Ping."</p> <p>5 What do you mean when you say it</p> <p>6 certainly helped Ping?</p> <p>7 A. I think Ping had a lot of similar</p> <p>8 concerns about the commitment of Citi to</p> <p>9 housing, and David assured her that Citigroup</p> <p>10 was committed to housing and committed to our</p> <p>11 business and committed to each of us.</p> <p>12 Q. And is this based upon what Ping</p> <p>13 told you?</p> <p>14 A. Yes.</p> <p>15 Q. Had Ping expressed similar</p> <p>16 concerns to you about the housing group?</p> <p>17 A. Ping had expressed some concerns</p> <p>18 to me, not the same concerns that Chia had but</p> <p>19 she was also concerned about Citi's commitment</p> <p>20 to housing.</p> <p>21 Q. Do you recall that Ms. Siu was</p> <p>22 ultimately offered a promotion at the end of</p> <p>23 the year?</p> <p>24 A. I do recall that, yes.</p> <p>25 Q. And do you know who made that</p>



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<p>205</p> <p>1 A. BARTOLETTI</p> <p>2 decision?</p> <p>3 A. I believe -- I don't know exactly</p> <p>4 who makes these decisions. I believe it was</p> <p>5 in part Mr. Brownstein.</p> <p>6 Q. And who else had a part in it?</p> <p>7 A. I'm not sure. Maybe Marty</p> <p>8 Feinstein.</p> <p>9 Q. Anyone else?</p> <p>10 A. That's all I know of.</p> <p>11 Q. And do you recall that Ping told</p> <p>12 you that Chia, that there is a chance Chia</p> <p>13 might leave?</p> <p>14 A. I remember Ping saying that, yes.</p> <p>15 Q. And did you talk to Chia about</p> <p>16 whether she was thinking of leaving?</p> <p>17 A. I talked to Chia. All that Chia</p> <p>18 expressed to me was concern over what was</p> <p>19 going on in the group. Chia never said to me</p> <p>20 that she was going to leave, that she was</p> <p>21 thinking about leaving, that this is, she is</p> <p>22 done with this business, as far as I remember,</p> <p>23 but she did express concerns over what was</p> <p>24 happening. She was very worried.</p> <p>25 Q. Did Ms. Siu ever tell you she was</p>	<p>207</p> <p>1 A. BARTOLETTI</p> <p>2 Citigroup as a third-year analyst?</p> <p>3 A. I don't know if I talked to her</p> <p>4 about the specifics of the contract. I know</p> <p>5 at the same time she was having some of these</p> <p>6 questions, she was concerned about signing the</p> <p>7 contract.</p> <p>8 Q. And did you talk to her about</p> <p>9 whether she should or should not sign that?</p> <p>10 A. I don't think I gave her advice</p> <p>11 either which way from what I remember. I</p> <p>12 mean, I wouldn't.</p> <p>13 Q. Did she tell you why she was</p> <p>14 hesitant to sign the contract?</p> <p>15 A. I believe it was for the same</p> <p>16 reason. She just wasn't sure of Citi's</p> <p>17 commitment to housing and the other reasons</p> <p>18 that are expressed here.</p> <p>19 Q. Do you know whether she ever</p> <p>20 signed that contract?</p> <p>21 A. I do not know.</p> <p>22 Q. Let me ask you about your jobs</p> <p>23 after Citigroup.</p> <p>24 A. Um-hum.</p> <p>25 Q. When did you begin with Ramirez?</p>
<p>206</p> <p>1 A. BARTOLETTI</p> <p>2 looking for other jobs?</p> <p>3 A. I don't believe so.</p> <p>4 Q. Did Ms. Siu ever tell you that she</p> <p>5 had other job options?</p> <p>6 A. I don't believe so. I don't</p> <p>7 remember her ever having any other options</p> <p>8 that I'm aware of -- that I was aware of.</p> <p>9 Q. So she never told you that?</p> <p>10 MR. WIGDOR: Objection.</p> <p>11 Q. Right?</p> <p>12 MR. WIGDOR: I think she's already</p> <p>13 answered the question.</p> <p>14 A. I mean, yeah, she did not tell me</p> <p>15 that. In fact, she, after speaking to David</p> <p>16 and getting these commitments that she felt --</p> <p>17 after she felt that Citi really was committed,</p> <p>18 she went out and got an apartment. Prior to</p> <p>19 that she lived with her parents. So I think</p> <p>20 once she felt comfortable that Citi was</p> <p>21 committed to housing, she took the step and --</p> <p>22 because she thought she was there for the</p> <p>23 long-term.</p> <p>24 Q. Did you talk to Ms. Siu about the</p> <p>25 contract she was offered to remain with</p>	<p>208</p> <p>1 A. BARTOLETTI</p> <p>2 June of 2009.</p> <p>3 Q. And in what position?</p> <p>4 A. Managing director.</p> <p>5 Q. And do you recall what the terms</p> <p>6 of the offer were?</p> <p>7 A. I do actually, yeah. From what I</p> <p>8 recall, I think it was 150,000 base salary, a</p> <p>9 bonus of 50,000 for the end of that year and</p> <p>10 then an all-in guarantee of 400,000 for the</p> <p>11 following year.</p> <p>12 Q. And those were minimum guarantees?</p> <p>13 A. Yes.</p> <p>14 Q. And did you get more than the</p> <p>15 minimum?</p> <p>16 A. I got more than the minimum in the</p> <p>17 second year.</p> <p>18 Q. In 2010?</p> <p>19 A. Yes.</p> <p>20 Q. And then you also participated in</p> <p>21 Ramirez's benefits programs, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Was the Ramirez offer the only</p> <p>24 offer you had after leaving Citi?</p> <p>25 A. No, it was not.</p>



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<p>233</p> <p>1 A. BARTOLETTI</p> <p>2 I'm not going to deny that. But, really, from</p> <p>3 my perspective, it was for, mostly for</p> <p>4 business reasons. I knew we had worked</p> <p>5 together in the past, we had worked together</p> <p>6 for 15 years. We knew we could work together</p> <p>7 well. We knew that clients liked us as a</p> <p>8 team. We knew it would be easy for clients to</p> <p>9 transfer business from somebody else to us</p> <p>10 together as a team, as opposed to transferring</p> <p>11 it, you know, trying to figure out who to</p> <p>12 transfer business to, if I was at JP and he</p> <p>13 was at Ramirez or whatever it was.</p> <p>14 Q. Do you recall at one point</p> <p>15 deciding that you would go to JP and then Mr.</p> <p>16 Fluehr talked you out of it?</p> <p>17 A. I remember one night I was</p> <p>18 thinking I was going to go to JP. I thought I</p> <p>19 had made my decision, and I had spoken to Mr.</p> <p>20 Fluehr and, yes, he might have had some</p> <p>21 influence, but that wasn't the sole -- that</p> <p>22 wasn't the sole reason I changed my decision.</p> <p>23 Part of that reason was absolutely</p> <p>24 because I felt we could work together better</p> <p>25 as a team and it would have been, I think, an</p>	<p>235</p> <p>1 A. BARTOLETTI</p> <p>2 Q. Right.</p> <p>3 A. He was a client at North Dakota</p> <p>4 Housing.</p> <p>5 Q. And on the bottom e-mail which is</p> <p>6 May 28th, 2009 you wrote: "I thought I made a</p> <p>7 decision for JP but when I spoke to Nick, he</p> <p>8 spent about an hour trying to convince me it</p> <p>9 was the wrong decision."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. And then you go on to say: "Truth</p> <p>13 is that my loyalty toward him is a big factor</p> <p>14 in this process, but it is difficult to</p> <p>15 differentiate what is right for him versus</p> <p>16 what is right for me."</p> <p>17 A. Sure.</p> <p>18 Q. Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Ultimately, were you able to make</p> <p>21 that differentiation between what is right for</p> <p>22 him and what is right for you?</p> <p>23 A. I think I was. I mean, I put</p> <p>24 together a spreadsheet to show what revenues I</p> <p>25 would have to generate in years ensuing after</p>
<p>234</p> <p>1 A. BARTOLETTI</p> <p>2 easier way for me to build business going</p> <p>3 forward. But part of it was all the other</p> <p>4 reasons I talked about, and I really felt like</p> <p>5 being at a big firm would have been -- it</p> <p>6 would have been a little tough emotionally for</p> <p>7 me, given what had just happened.</p> <p>8 Q. And despite that, you had, you</p> <p>9 thought you had decided to go to JP and he</p> <p>10 talked you out of it?</p> <p>11 A. I was changing my mind back and</p> <p>12 forth every five minutes, to be honest with</p> <p>13 you.</p> <p>14 MR. TURNBULL: Let me have mark as</p> <p>15 Bartoletti Exhibit 14, an e-mail</p> <p>16 exchange, Bates No. PL 15873 through</p> <p>17 15877.</p> <p>18 (Bartoletti Exhibit 14, e-mail</p> <p>19 exchange, Bates No. PL 15873-877</p> <p>20 marked for identification, as of</p> <p>21 this date.)</p> <p>22 Q. Do you see the e-mail, the two</p> <p>23 e-mails on the first page, one actually</p> <p>24 carries over to the second page?</p> <p>25 A. Yes. With Pat Nagel.</p>	<p>236</p> <p>1 A. BARTOLETTI</p> <p>2 2010 to make more money at Ramirez, and I was</p> <p>3 pretty convinced I would be able to do that,</p> <p>4 particularly in a team environment with</p> <p>5 someone whom I had worked with for 15 years.</p> <p>6 Q. Do you remember telling Mr. Fluehr</p> <p>7 that you decided to go to Ramirez based on</p> <p>8 your loyalty to him?</p> <p>9 A. That, again, it could have been</p> <p>10 one factor, but it wasn't the sole factor and</p> <p>11 I never would have taken a job that I thought</p> <p>12 was of lesser quality if I had -- for Nick. I</p> <p>13 mean, that's silly.</p> <p>14 Q. In the e-mail above what was the</p> <p>15 one we just looked at.</p> <p>16 A. Um-hum.</p> <p>17 Q. You say: "I think you will be</p> <p>18 surprised by this but I am leaning towards</p> <p>19 Ramirez."</p> <p>20 A. Sure.</p> <p>21 Q. Why do you say that --</p> <p>22 A. To Mr. Nagel.</p> <p>23 Q. -- he will be surprised?</p> <p>24 A. Because Pat Nagel had not really</p> <p>25 heard of Ramirez, and Pat Nagel works for</p>



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AMY BARTOLETTI

June 14, 2012

<p>245</p> <p>1 A. BARTOLETTI</p> <p>2 A. Yes, that's how I was feeling at</p> <p>3 that moment. As I said, my mind switched back</p> <p>4 and forth literally every five minutes. It</p> <p>5 was a very, very hard decision for me to make,</p> <p>6 and I think ultimately I was deciding between</p> <p>7 two very good firms.</p> <p>8 Q. Did you decide, as you say here,</p> <p>9 to go to Ramirez out of loyalty to Nick?</p> <p>10 A. Loyal -- that might have been one</p> <p>11 reason, one part of the reason. Because after</p> <p>12 what I had experienced at Citigroup, loyalty</p> <p>13 was actually something at that time I was</p> <p>14 valuing probably more than I would have</p> <p>15 otherwise. But I also felt very strongly</p> <p>16 that, from an economic perspective I was</p> <p>17 taking what I considered equal jobs and I</p> <p>18 truly believed at that time that I actually</p> <p>19 had more upside potential at Ramirez than I</p> <p>20 did at JPMorgan.</p> <p>21 Q. And why wasn't Ramirez your first</p> <p>22 choice?</p> <p>23 A. Because, as I said before, you</p> <p>24 talk to the clients in the Midwest, they know</p> <p>25 who JPMorgan is. It sounds easy.</p>	<p>247</p> <p>1 A. BARTOLETTI</p> <p>2 fence about this decision and literally from</p> <p>3 moment to moment, it was a toss-up for me and</p> <p>4 there were many positive things at Ramirez and</p> <p>5 there are many positive things at JP, but</p> <p>6 ultimately I felt like I was making the right</p> <p>7 decision for me from an economic and business</p> <p>8 perspective going to Ramirez.</p> <p>9 Q. Why did you feel loyalty to Nick</p> <p>10 Fluehr?</p> <p>11 A. I felt loyalty to him because I</p> <p>12 worked with him for 15 years and we worked</p> <p>13 very well together and I think he treated me</p> <p>14 fairly while I was working with him. And it</p> <p>15 was an unknown working for -- with anyone else</p> <p>16 because you don't know until you get there</p> <p>17 what it's going to really be like.</p> <p>18 Q. I take it when you are sending</p> <p>19 this e-mail to your significant other, that</p> <p>20 you are being candid with him, right?</p> <p>21 A. At that moment I was probably</p> <p>22 telling him how I felt at that moment very</p> <p>23 explicitly.</p> <p>24 MR. TURNBULL: Let me have marked</p> <p>25 as Bartoletti Exhibit 17, an e-mail</p>
<p>246</p> <p>1 A. BARTOLETTI</p> <p>2 But, then, again, I wouldn't have</p> <p>3 I don't think as much job security because</p> <p>4 it's another big firm. I don't know who is</p> <p>5 making the decisions whether to let the</p> <p>6 housing group go, whether to let me go,</p> <p>7 whether to let all the women in the department</p> <p>8 go.</p> <p>9 Q. So you went with your second</p> <p>10 choice out of loyalty to Nick?</p> <p>11 A. It was no longer my second choice</p> <p>12 when I changed my mind. This is how I felt at</p> <p>13 that moment, but then it -- I would not have</p> <p>14 chosen it if it wasn't my choice, ultimately.</p> <p>15 Q. But you say you are choosing it</p> <p>16 even though it is not your first choice,</p> <p>17 right?</p> <p>18 A. I might have said that, but that's</p> <p>19 not what I meant. I mean, I wouldn't have</p> <p>20 gone there had I not thought it was the right</p> <p>21 choice for me.</p> <p>22 Q. Well, you say in here I'll go</p> <p>23 there if you really need me, otherwise I will</p> <p>24 go to JP, right?</p> <p>25 A. Again. I was torn. I was on the</p>	<p>248</p> <p>1 A. BARTOLETTI</p> <p>2 exchange between you and Julie Burger.</p> <p>3 A. Okay.</p> <p>4 (Bartoletti Exhibit 17, e-mail</p> <p>5 exchange between Amy Bartoletti and</p> <p>6 Julie Burger marked for</p> <p>7 identification, as of this date.)</p> <p>8 Q. Do you see this e-mail exchange is</p> <p>9 from October 31 and November 1st of 2009?</p> <p>10 A. Yes.</p> <p>11 Q. And at the time, where was Julie</p> <p>12 Burger working?</p> <p>13 A. She was at Ramirez.</p> <p>14 Q. And she was considering another</p> <p>15 opportunity, correct?</p> <p>16 A. Yes. I'm just trying to remember</p> <p>17 which one it was because she had a couple of</p> <p>18 opportunities.</p> <p>19 Q. Well, maybe I can help. If you</p> <p>20 turn to page 2.</p> <p>21 A. Okay.</p> <p>22 Q. Your e-mail to her which is in the</p> <p>23 middle of the page, you talk about Citi?</p> <p>24 A. Sure. Okay.</p> <p>25 Q. Was Ms. Burger considering a job</p>



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<p>261</p> <p>1 A. BARTOLETTI</p> <p>2 with --</p> <p>3 A. Absolutely. I would be a fool to</p> <p>4 think if they wouldn't. But I think I built</p> <p>5 that into my analysis as well.</p> <p>6 MR. TURNBULL: Why don't we take a</p> <p>7 break here.</p> <p>8 MR. WIGDOR: Okay. How much more</p> <p>9 time do you think you have, Ken?</p> <p>10 MR. TURNBULL: An hour.</p> <p>11 MR. WIGDOR: Okay.</p> <p>12 THE VIDEOGRAPHER: The time now is</p> <p>13 2:59 p.m. This marks the end of tape</p> <p>14 No. 4. Going off the record.</p> <p>15 (Recess taken.)</p> <p>16 THE VIDEOGRAPHER: The time now is</p> <p>17 3:11 p.m. This marks the beginning of</p> <p>18 tape No. 5. We're back on the record.</p> <p>19 BY MR. TURNBULL:</p> <p>20 Q. Ms. Bartoletti, after Mr. Fluehr</p> <p>21 left Ramirez, did he get another job?</p> <p>22 A. Yes, he did.</p> <p>23 Q. Where is that?</p> <p>24 A. At Wells Fargo.</p> <p>25 Q. So he went to another big</p>	<p>263</p> <p>1 A. BARTOLETTI</p> <p>2 Q. And part of the reason you went to</p> <p>3 Ramirez was your relationship with Mr. Fluehr?</p> <p>4 A. Yes. But a big part of it was the</p> <p>5 fact that, you know, from a business</p> <p>6 standpoint we would be able to bring in</p> <p>7 clients together.</p> <p>8 Q. And other than you looking for a</p> <p>9 job at Wells Fargo, where else have you looked</p> <p>10 for a job?</p> <p>11 A. I have looked at a lot of places,</p> <p>12 actually.</p> <p>13 Q. Did you look at any places before</p> <p>14 Mr. Fluehr left Ramirez?</p> <p>15 A. Yes.</p> <p>16 Q. And some of them were looking to</p> <p>17 go as a team?</p> <p>18 A. Yeah. The one place was at Wells,</p> <p>19 yes.</p> <p>20 Q. And other than Wells, did you look</p> <p>21 at any other positions before Mr. Fluehr left?</p> <p>22 A. I don't remember.</p> <p>23 Q. Do you remember looking at any</p> <p>24 places on your own, in other words, not going</p> <p>25 with Mr. Fluehr while he was still employed at</p>
<p>262</p> <p>1 A. BARTOLETTI</p> <p>2 institution?</p> <p>3 A. He did.</p> <p>4 Q. Were you surprised that he went to</p> <p>5 a big institution?</p> <p>6 A. I was not surprised that he went</p> <p>7 to Wells.</p> <p>8 Q. After he went to Wells, did you</p> <p>9 apply for a position at Wells?</p> <p>10 A. I did speak to folks at Wells,</p> <p>11 yes.</p> <p>12 Q. Did you still feel loyalty to Mr.</p> <p>13 Fluehr after he left Ramirez?</p> <p>14 A. Somewhat.</p> <p>15 Q. Did you, did you feel that you and</p> <p>16 Mr. Fluehr, or do you feel that you and Mr.</p> <p>17 Fluehr are friends?</p> <p>18 A. Friends -- I don't know, that's a</p> <p>19 tough question, actually.</p> <p>20 Q. You certainly --</p> <p>21 A. We're friendly, I mean, you know.</p> <p>22 Q. But you certainly weighed the</p> <p>23 advice he was giving you about what job to</p> <p>24 accept, correct?</p> <p>25 A. I did, yes.</p>	<p>264</p> <p>1 A. BARTOLETTI</p> <p>2 Ramirez?</p> <p>3 A. I'm not sure actually. I'm not,</p> <p>4 you know, I'm a little confused on the timing</p> <p>5 of things because I did reach out to other</p> <p>6 places; I just don't know if it was before or</p> <p>7 after he was there. I don't want to give you</p> <p>8 the wrong info.</p> <p>9 Q. So who else have you reached out</p> <p>10 to, other than Wells Fargo, who else have you</p> <p>11 reached out to for jobs?</p> <p>12 A. I reached out to Loop, to Siebert,</p> <p>13 to First Southwest Securities, to Morgan</p> <p>14 Stanley, to JPMorgan.</p> <p>15 I mean, I reached out to every</p> <p>16 place that I thought would be a possibility of</p> <p>17 hiring me pretty much that I could think of.</p> <p>18 Q. And why have you started looking</p> <p>19 to leave Ramirez?</p> <p>20 A. Because of compensation.</p> <p>21 Q. Any other reasons?</p> <p>22 A. That's the primary reason.</p> <p>23 Q. Any other reasons?</p> <p>24 A. Sure, there are some reasons.</p> <p>25 Let's see.</p>



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